

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF OKLAHOMA**

1. LADONNA PARIS,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 22-CV-235-TCK-JFJ
)	
1. RONNI CARROCIA,)	
2. DAYLAN ROOT,)	
3. TY BURNS,)	
4. CITY OF TULSA,)	
5. G.T. BYNUM, IV,)	
)	
Defendants.)	

**DEFENDANT CITY OF TULSA’S UNOPPOSED MOTION
FOR DISCOVERY PROTECTIVE ORDER**

Defendant City of Tulsa respectfully requests the Court enter a Stipulated Discovery Protective Order for this case. No party objects to this motion.

1. The Plaintiff is seeking confidential personnel records and proprietary information related to law enforcement. In order to protect these interests, a Discovery Protective Order is necessary.
2. The parties have agreed to this motion and to the attached Exhibit 1, Stipulated Protective Order. A separate Stipulated Protective Order is provided for the Court's consideration.
3. This motion is in compliance with the Court’s Protective Order instructions.

Respectfully Submitted,

CITY OF TULSA,
a municipal corporation

JACK C. BLAIR,
City Attorney

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CERTIFICATE OF MAILING

I hereby certify that on the 15th day of November 2022, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to all ECF registrants who have appeared in this case.

s/R. Lawson Vaughn
R. Lawson Vaughn